



U.S. Department of Justice

United States Attorney

Southern District of New York

**MEMO ENDORSED**

**p. 2**

86 Chambers Street, 3rd floor  
New York, New York 10007

June 23, 2008

**BY HAND**

The Honorable Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 650  
New York, New York 10007

Re: Estrada v. DHS, No. 08 Civ. 4849 (RMB)

Dear Judge Berman:

On behalf of the Government, I write respectfully to request that the initial pre-trial conference in the above-reference proceeding — currently scheduled for Wednesday, June 25, 2008, at 9:00 a.m. — be adjourned because we expect the matter to be resolved soon. The petitioners' lawyer, William H. Oltarsh, has consented to this first request for an adjournment.

The petition seeks an order compelling the adjudication of the adjustment-of-status applications of Jose Barragan Estrada, his wife Laura Sanchez Pulido, and his daughter Laura Barragan Sanchez. On June 13, 2008, U.S. Citizenship and Immigration Services approved the applications of Jose Estrada and his daughter. His wife's application is still pending, but once it has been adjudicated, the petition will be moot. We therefore respectfully request that the initial pre-trial conference be adjourned approximately one month.

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Thank you for your consideration of this request.

Respectfully submitted,  
MICHAEL J. GARCIA  
United States Attorney  
Southern District of New York

By: \_\_\_\_\_

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cc: Mr. William H. Oltarsh, Esq. (counsel for petitioners)  
*By fax to (212) 944-9120*

<u>Application granted. Conference</u>	
<u>adjourned to 7/29/08 at 2:00 p.m.</u>	
SO ORDERED:	<u>Richard M. Berman</u> Richard M. Berman, U.S.D.J.
Date: <u>6/24/08</u>	